

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Promoting Telehealth for Low-Income Consumers) WC Docket No. 18-213
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To: The Commission

COMMENTS OF COBANK, ACB

CoBank, ACB (“CoBank”) hereby submits these comments in response to the Notice of Inquiry adopted on August 2, 2018 by the Federal Communication Commission (the Commission) in the matter of promoting telehealth for low-income consumers. CoBank shares the Commission’s interest in telehealth solutions for low-income consumers living in rural communities. Over the past twelve months, we have committed to over \$500,000 in grants to support four telemedicine projects in rural communities to address Type-II diabetes management, maternity care, opioid misuse, and veteran’s care. The goal of CoBank’s support is to catalyze wide spread adoption of telemedicine to increase the level of health care in rural communities.

Based just outside Denver in Greenwood Village, CO, CoBank is a national cooperative bank with a mission to provide dependable credit and other value-added financial services to

agriculture and rural infrastructure businesses. CoBank is a proud member of the Farm Credit System, a national network of cooperative banks and retail lending associations chartered by Congress to support the borrowing needs of U.S. agriculture and the nation's rural economy.

CoBank shares the goal of the Commission to promote the use of connected care services among rural low-income households and low-income veterans. In our limited experience in supporting the efforts to promote the adoption of telehealth, we recommend the continued focus of the Universal Service Fund to provide to consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, access to affordable telecommunications and information services. Low-income households and low-income veterans need affordable telecommunications and information services to benefit from telehealth, so no telehealth solution will be viable without supporting the broadband infrastructure to deliver universal service in rural high cost areas.

Regarding the structure of the program, we recommend increasing the number of the pilot programs and lowering the funding amount per pilot. Pilots in multiple locations across the country will increase adoption of telehealth to more communities.

The program should not support one specific service provider over another. A patient's choice of a broadband provider should not exclude them from participating in the pilot.

We also recommend that the health care providers should determine which health care priorities to address in the pilot. Each region is different and the health care providers know their local needs better than anyone else.

The telehealth pilot programs that CoBank has underwritten are in the early stages of implementation and we are pleased with the early results. We look forward to sharing the outcomes of the pilot with the Commission in the future. Thank you for the opportunity to share our perspective of how the Commission can continue their support of telehealth adoption.

Respectfully submitted,

COBANK, ACB

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